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Of Attorneys for Robert West

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

ROBERT LEE WEST

Plaintiff,

v.

MAYOR HALES, CHIEF OF POLICE REESE,
and 150 OFFICERS,

Defendants.

Case No. 3:15-cv-00715-ST

PLAINTIFF'S MOTION FOR AN
EXTENSION OF TIME TO FILE AN
AMENDED COMPLAINT

Plaintiff, Robert West, by and through his appointed counsel, submits this motion for an extension of time to amend and refile plaintiff's complaint.

Mr. West filed this case *pro se* on April 28, 2015. The Court dismissed his complaint on May 12, 2015. The undersigned accepted his appointment as counsel on June 24, 2015. Since accepting the appointment, plaintiff's counsel has had a jury trial and an arbitration, as well as several important filing deadlines, which have limited his ability to work on this case.

For the past few weeks, plaintiff's counsel has been in touch with representatives from the City of Portland to discuss settlement. Plaintiff and plaintiff's counsel believe that there may be an opportunity to resolve this matter without litigation. For these reasons plaintiff's counsel requests a 45-day extension to refile the complaint.

An extension will not prejudice the defendants in this case. Defendants have received and acknowledged a timely tort claims notice. The statute of limitations for the claims that will likely be alleged does not expire for another 16-months on November 29-30, 2016.

Therefore, Plaintiff's counsel respectfully requests that the deadline to refile the complaint be extended to September 4, 2015.

DATED: July 16, 2015.

HITT HILLER MONFELS WILLIAMS LLP

By: /s/ Greg Lockwood
Greg Lockwood, OSB No. 114415
Attorney for Plaintiff